

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN - 9 2014

Mr. Paul Warden Analytical Services, Inc. 130 Allen Brook Lane Williston, VT 05495

OFFICE OF WATER

Re: Freedom of Information Act (FOIA) Requests: EPA-HQ-2013-010434; HQ-2014-001864, 001865, and 002287

Dear Mr. Warden,

This concerns your FOIA requests referenced above, for data regarding public water systems (PWSs) and possible grandfathered PWSs under the Long Term 2 Enhanced Surface Water Treatment Rule (LT2). Attached is the available data from the DCTS for systems that <u>intended</u> to submit grandfather data for the first round of LT2 source water monitoring. This list is from a download of the DCTS in 2012 and used by Lili Wang. The attached data, together with the data that we provided under FOIA request HQ-2013-010434 (also attached), represent all data to date. This data is being provided to you at no cost. Please note the following caveats:

- Much of the data in the Grandfather Data section of the DCTS was incomplete. Water systems intending
 to grandfather data were not required by the LT2 Rule to electronically submit information. In addition,
 difficulties in the initial rollout of the DCTS resulted in some states directing their water systems to
 submit information by other means (e.g., fax or regular mail) meaning information would not be captured
 in the DCTS.
- While the PWS may have indicated a certain number of samples should be considered to grandfather the actual number may be different based on the determination of the primacy agency whether grandfather data satisfied specified criteria (e.g., date ranger or approved analytical method).
- The Grandfather Data section was not linked to the inventory section of the DCTS so contact or address information is not included in the attached spreadsheet. If the PWS accessed the DCTS for other reasons (e.g., Stage 2 IDSE) the contact information may exist in the previous data pull provided by EPA.

As a reminder, water systems begin source water monitoring for Cryptosporidium and E. coli in April 2015.

You may appeal our response to the National Freedom of Information Officer, U.S. EPA, FOIA and Privacy Branch, 1200 Pennsylvania Avenue, NW (2822T), Washington, DC 20460 (U.S. Postal Service Only), FAX: (202) 566-2147, E-mail: hq.foia@epa.gov. Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, NW. If you are submitting your appeal via hand delivery, courier service or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, NW, Room 6416J, Washington, DC 20004. Your appeal must be made in writing, and it must be submitted no later than 30 calendar days from the date of this letter. The Agency will not consider appeals received after the 30 calendar day limit. The appeal letter should include the FOIA numbers listed above. For quickest possible handling, the appeal letter and its envelope should be marked "Freedom of Information Act Appeal."

Sincerely,

Stephanie Flaharty

FOIA Public Liaison

Office of Ground Water and Drinking Water